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14	UNITED STATES DISTRICT COURT		
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
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18	ISAAC LEWIS, Case No. 3:11-CV-11-5250 WHA		
19	Plaintiff,) STIPULATED REQUEST FOR ORDER) REMOVING FROM CALENDAR HEARING		
20	vs.) ON MOTION TO DISMISS AND) CHANGING TIME OF INITIAL CASE		
21	THE PERMANENTE MEDICAL GROUP, MANAGEMENT CONFERENCE KAVEH BROOJENI, et al., (CIVIL L.R. 6-2)		
22	Defendants.		
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25	Pursuant to Civil Local Rule 6-2, the parties request an order removing from the calendar		
26	the hearing on the Defendant Kaiser Foundation Hospitals' Motion to Dismiss the Complaint		
27	("Motion to Dismiss") currently scheduled for December 22, 2011, and changing the date on		
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which this Court holds the Initial Case Management Conference from December 22, 2011, to March 1, 2012, for the following reasons.

- 1. On December 12, 2011, Plaintiff Isaac Lewis filed a First Amended Complaint ("FAC") which, among other things, deletes causes of action that were the subject of the Motion to Dismiss, thereby making moot the Motion to Dismiss.
 - 2. The FAC adds a defendant, Local Union 250, which has not yet been served.
- 3. The FAC adds new claims and allegations which Defendant Kaiser Foundation Hospitals has not yet had an opportunity to evaluate.
- 4. Plaintiff's attorney, Angela Morgan, has two major surgeries on December 20, 2011, and will be unavailable until mid-February while she recovers.

No previous time modifications have been made in this case.

The requested time modification will have no effect on any other dates in this case.

For these reasons, to which the parties attest in the accompanying declaration, and on this record, Defendant Kaiser Foundation Hospitals and Plaintiff Isaac Lewis, through their counsel of record, stipulate to request the following Order of this Court:

1	A. That Defendant's Motion to Dismiss the Complaint, scheduled for hearing on		
2	December 22, 2011, be declared moot and removed from the calendar.		
3	B. That the Initial Case Management Conference set for December 22, 2011, at 8:30 a.m.,		
4	be postponed until March 1, 2012, at 8:30 a.m.		
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6	DATED: December 13, 2011	MORGAN & ASSOCIATES	
7			
8		By: <u>/s/ Angela L. Morgan</u> Angela L. Morgan	
9		Attorney for Plaintiff ISAAC LEWIS	
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11			
12	DATED: December 13, 2011	DAVIS WRIGHT TREMAINE LLP	
13		By: <u>/s/ Candice S. Petty</u>	
14		Judith Droz Keyes Candice S. Petty	
15	To the state of th	,	
16 17		Attorneys for Defendant KAISER FOUNDATION HOSPITALS, previously erroneously sued as The Permanente Medical Group	
18		retinaliente ivieuicai Group	
19	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
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21	DATED: December 19, 2011.	W Ahr	
22	WILLIAM ALSUP		
23		UNITED STATES DISTRICT JUDGE	
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